IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF OHIO **CIVIL DIVISION**

BRENT A. ADKINS,	§	
Plaintiff,	§	
	§	
	§	Case No. 1:17-cv-00643-SJD
v.	§	
	§	Judge Susan J. Dlott
MARATHON PETROLEUM	§	S
COMPANY, LP,	§	
Defendant.	§	

PLAINTIFF'S MOTION FOR LEAVE TO FILE DISCOVERY MOTIONS

COMES NOW Brent Adkins, Plaintiff, through undersigned counsel and respectfully requests that he may be allowed to file the following Proposed Motions:

- 1. Motion to Strike Defendants Answers and Compel Responses to Written Discovery
- 2. Motion to Compel Entry on Land

Although under the Local Rules and Standing Orders of the Southern District of Ohio, and Judges Dlott and Litkovitz, parties are required to undergo informal dispute resolution regarding the filing of discovery motions, however, Plaintiff believes that in the interests of bringing these matters before the Court it is necessary to file the instant motions without delay. Accordingly, Plaintiff respectfully requests that this Court enter and consider the Proposed Motions, attached herewith.

Respectfully submitted,

/s/ S. Reed Morgan S. REED MORGAN THE CARLSON LAW FIRM Texas State Bar No: 14452300 100 E. Central Texas Expy Killeen, TX 76541

Telephone: (800) 359-5690 Facsimile: (254) 526-8204

E-Mail: rmorgan@carlsonattorneys.com

FRANKLIN G. SHAW

La. Bar # 1594 LEGER AND SHAW 512 E. Boston Street Covington, Louisiana 70433 P) 985-809-6625 F) 985-809-6626

AARON G DURDEN 10 West Monument Ave Dayton, OH 45402 937-938-1182 agdlawyer@aol.com ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the above and foregoing pleading

has been served on all counsel of record via email this 22nd day of July 2019.

Raymond L. Massey
Daniel Massey
The Massey Law Firm
Two City Place Drive
Suite 200
St. Louis, MO 63141
314-812-4888
Ray@themasseylawfirm.com
dan@themasseylawfirm.com

Maureen Bickley
Frost Brown Todd LLC
Great American Tower
301 East Fourth Street, Suite 3300
Cincinnati, OH 45202
(513) 651-6800
gcowan@fbtlaw.com
mbickley@fbtlaw.com

/s/ S. Reed Morgan